

EXHIBIT D

Rec'd 7/30/07

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Case # 07 CVI 6038

Gerald M. Lemus, PRO SE
1716 N Indian River Road
New Smyrna Beach, Florida 32169

United States District Court
Southern District of New York

American Guarantee & Liability Insurance Company

Plaintiff

Versus

Gerald M. Lemus
Defendant PRO SE

Please accept my response individually, John R. Watson and myself are not
Communicating.

Answers to Law Suit

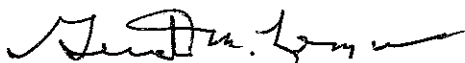
1. Accept
2. Accept
3. Unknown
4. Deny, Gerald M. Lemus is a resident of Volusia County, Florida
5. Accept
6. Accept
7. Accept
8. Accept
9. Accept
10. Accept
11. Accept

12. Accept
13. Accept
14. Deny Plaintiff continued to accept premiums and offer coverage for ?? months when debtor was in chapter 11 reorganization of Bankruptcy. IWI filed for chapter 11 in April 2006. The bond was in effect until December of 2006.
15. Deny State of Florida has been over charging Independent Wholesale, Inc. for cigarette and Tobacco taxes. Once IWI and the State of Florida have reached a settlement, that should eliminate any taxes due. The proof of the claim is being disputed due to the fact that the State of Florida has been overcharging Independent Wholesale, Inc. cigarette and tobacco taxes. The State of Florida made no claim against the Bond company. The State of Florida settled with one of our competitors, McLane Sun East because they were also being overcharged.
16. Deny. See answer #15
17. Deny. See answer #15
18. Deny. Any amount owed to State of Florida has yet to be determined. State of Florida may owe Independent Wholesale, Inc. a refund.
19. Deny Independent Wholesale, Inc. is one of many Tobacco Wholesalers to file multimillion dollar lawsuits currently at the Supreme Court. Depending on outcome of said law suit Independent Wholesale, Inc. may have sufficient monies to pay all of its creditors. The Supreme Court cases are entitled as Andalusia Distributing Co., Inc., et al v. RJ Reynolds Tobacco Co., and Andalusia Distributing Co., Inc., et al v. Philip Morris USA, Inc. and are consolidated under case number 06-1578.
20. Deny Independent Wholesale, Inc. is in the process of selling real estate to pay approximately \$4 million dollars of debt.
21. Accept
22. Deny Until the State of Florida reconciles the over charge of taxes it is not a fact that any money is due
23. Deny No loss has been established until the State of Florida files A claim with the bond company.
24. Deny See # 22
25. Deny See # 22

26. Unknown, No proof of claim
27. Unknown No proof of claim
28. Accept
29. Deny The State of Florida is in the process of reconciling the taxes in question.
The State has made no claim to the bond company.
30. Deny
31. Deny
32. Deny
33. Deny
34. Deny see # 29
35. Accept See #29
36. Deny See #29
37. Unknown
38. Unknown
39. Deny See #29

Dated: New Smyrna Beach, Florida
Volusia County, Florida
July 27, 2007

Respectfully submitted


Gerald M. Lemus